

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA

CIVIL ACTION NO.: 1:17-cv-00854-TDS-LPA

REBECCA KOVALICH and  
SUZANNE NAGELSKI,

Plaintiffs,

vs.

PREFERRED PAIN MANAGEMENT  
& SPINE CARE, P.A., DR. DAVID  
SPIVEY, individually, and SHERRY  
SPIVEY, individually,

Defendants.

**JOINT MOTION FOR ENTRY OF  
STIPULATED CONSENT  
PROTECTIVE ORDER**

NOW COME, Plaintiffs, Rebecca Kovalich and Suzanne Nagelski (“Plaintiffs”), and Defendants Preferred Pain Management & Spine Care, P.A., Dr. David Spivey and Sherry Spivey (“Defendants”), (collectively referred to as the “Parties”) and hereby move this Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, as well as LR7.3, for entry of a Stipulated Consent Protective Order (attached as “Exhibit A”). In support of this Motion, the Parties state as follows:

1. The Consent Protective Order would expedite the flow of discovery materials, facilitate the prompt resolution of discovery disputes and confidentiality concerns, protect certain material designated as **“CONFIDENTIAL”** (“Confidential Materials”) and ensure that protection is afforded only to material so designated as confidential.

2. Counsel for the Parties have conferred and agree that the Confidential Materials are potentially relevant to the claims and defenses asserted in this action, that the Parties have a substantial need of them, but recognize that access to the materials should be restricted.

3. As a result, counsel for the Parties have conferred and agree to the entry of the Consent Protective Order, which is attached as “Exhibit A” to this Motion.

4. This Motion is supported by “good cause.”

THEREFORE, the Parties hereby respectfully request that this Joint Motion for Consent Protective Order be granted.

Respectfully submitted this the 26<sup>th</sup> day of February, 2018.

VAN KAMPEN LAW P.C.

JACKSON LEWIS P.C.

/s/ Sean F. Herrman

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**CERTIFICATE OF  
SERVICE**

The undersigned certifies that on February 26, 2018, the foregoing *Joint Motion for Entry of Stipulated Consent Protective Order* was electronically filed with the Clerk of the Court, using the Court's CM/ECF electronic service system, which will send notification of such filing as follows:

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